

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:16 CR 83 HEA/NCC
	)	
MICHAEL MCDONALD	)	
	)	
Defendant.	)	

**JOINT REQUEST TO CONTINUE MOTIONS HEARING**

COMES NOW defendant MICHAEL MCDONALD, through his attorney, Robert C. Wolfrum, Assistant Federal Public Defender, and with the authorization of the Assistant United States Attorney Robert Livergood to jointly request that the hearing on pretrial motions in this cause, currently set for Wednesday, May 24, at 10:00 a.m., be continued for a period of approximately thirty days or more. In support of this joint motion, it is stated:

- 1) This is a case of some complexity that, among other things, involves events that allegedly occurred in another country and seizure of property in a foreign country.
- 2) Assistant United States Attorney Robert Livergood learned this date and informed undersigned counsel that there is new forensic evidence that has been developed that is pertinent to the motion to suppress physical evidence. There will be a new report coming in connection with that evidence.
- 3) Independent of that, undersigned counsel had intended to supplement his motion to suppress argument. This new information may cause the need for further discussions with the defendant and may cause the need for further supplementation of the pleadings.

4) The parties are in agreement concerning this request. The parties would jointly request that the new hearing not be reset until the additional disclosure has been received and any supplementation to the pleadings has occurred.

BY REASON OF THE FOREGOING, the parties jointly request that the hearing on pretrial motions in this cause, currently set for Wednesday, May 24, at 10:00 a.m., be continued for a period of approximately thirty days or more.

Respectfully submitted,

/s/Robert C. Wolfrum  
ROBERT C. WOLFRUM  
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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on May 18, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Rob Livergood, Assistant United States Attorney.

/s/Robert C. Wolfrum  
ROBERT C. WOLFRUM  
Assistant Federal Public Defender